

1 ISMAIL J. RAMSEY, CSBN 189820
United States Attorney
2 MATHEW W. PILE, WSBA 32245
Associate General Counsel
3 Office of Program Litigation, Office 7
ELIZABETH LANDGRAF, CSBN 313184
4 Special Assistant United States Attorney
Social Security Administration
5 6401 Security Boulevard
Baltimore, MD 21235
6 Telephone: (510) 970-4828
Facsimile: (415) 744-0134
7 Attorneys for Defendant

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10 **UNITED STATES DISTRICT COURT**
11 **NORTHERN DISTRICT OF CALIFORNIA**
12

13 JANET E. DARCEY,

14 Plaintiff,

15 v.

16 KILOLO KIJAKAZI,
Acting Commissioner of Social Security,

17 Defendant.
18

No. 4:22-cv-09080-DMR

STIPULATION AND ORDER FOR A
FIRST EXTENSION TO FILE
DEFENDANT'S RESPONSE TO
PLAINTIFF'S MOTION FOR SUMMARY
JUDGMENT

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20 The parties stipulate through counsel that the time for Defendant, the Acting
21 Commissioner of Social Security (the "Commissioner"), to file her response to Plaintiff's Motion
22 to Remand for Administrative Hearing ("Motion") (ECF No. 13) be extended by thirty (30) days,
23 from May 22, 2023, up to and including June 21, 2023. This is Defendant's first request for an
24 extension of time to file her response to Plaintiff's Motion.

25 The undersigned attorney for Defendant was recently reassigned to this case, on May 10,
26 2023, less than two weeks from the date of Defendant's current deadline. The undersigned
27 attorney needs more time to review the administrative record, determine whether settlement
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options may exist, and, if not, respond to Plaintiff's Motion. In addition, the undersigned attorney already has four district court briefs due in the next two weeks. For these reasons, the Commissioner respectfully requests an extension of 30 days, until June 21, 2023, to respond to Plaintiff's Motion. This request is made in good faith with no intention to unduly delay the proceedings.

The parties further stipulate that the Court's Scheduling Order (ECF No. 6) shall be modified accordingly.

Respectfully submitted,

Dated: May 10, 2023

By: /s/ Donald Harrison Medearis
DONALD HARRISON MEDEARIS
Bay Area Legal Aid
(as authorized by email)
Attorney for Plaintiff

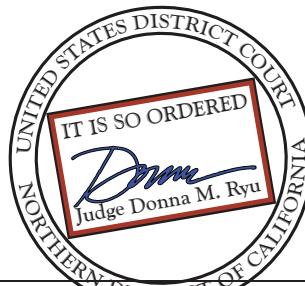
Dated: May 10, 2023

ISMAIL J. RAMSEY (CSBN 189820)
United States Attorney
MATHEW W. PILE
Associate General Counsel
Office of Program Litigation, Office 7
Social Security Administration

By: /s/ Elizabeth Landgraf
ELIZABETH LANDGRAF
Special Assistant United States Attorney
Attorney for Defendant

IT IS SO ORDERED:

DATE: May 11, 2023



HONORABLE DONNA M. RYU
Chief Magistrate Judge